LAW OFFICES

MASSACHUSETTS JUSTICE PROJECT, INC.

57 SUFFOLK STREET Suite 401 HOLYOKE, MA 01040-5015 TEL. 413 -533-2660 (Voice & TTY)

TOLL FREE 1-800-639-1209

FAX 413-535-1774

March 5, 2003

Mattie Condray Legal Services Corporation 750 First Street, NE Washington, DC 20002-4250



Dear Ms Condray:

I write to comment on the Limited English Proficiency (LEP) guidance. It was good to see that LSC is giving this issue some attention, given that our program is in a service area populated by a high percentage of LEP clients.

That being said, I oppose the issuance of new regulations for LSC recipients to implement Title VI/LEP. As I understand it, issuing a regulation is not required by Title VI because LSC funding is not "federal financial assistance." Regulations would add a burden on both the Corporation and its recipients where none is needed. On our part, we are already obligated by our grant assurances not to discriminate on the basis of national origin and I support those assurances. Also, many recipients are already obliged by other grants to follow Title VI, making further regulation by LSC unnecessary. I support and join the NLADA comments on this.

I support non-binding, non-regulatory guidance for recipients modeled on the DOJ guidance. This would help recipients by giving them information about 'best practices' for providing services consistent with Title VI. Individualized assessment about what is a reasonable LEP plan for each program make sense. I support guidance consistent with the DOJ guidance and drafted in coordination with the civil rights community and others who have proven expertise in this area. LSC can further quality services to the LEP population by collecting and distributing information on what has been successful in the field and encouraging innovative ways to serve the LEP population and providing guidance, oversight, training and best practices to LSC recipients in how to serve our LEP population.

Again, I support the NLADA comments and I thank you for turning attention to this very important area for our clients.

Sincerely,

Olga Candelario Office Manager

